



Cummins Westport  
The Natural Choice



May 23, 2018

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Volkswagen Settlement – Environmental Mitigation Trust for California

Dear Board Members and Staff,

Position: **SUPPORT**

Cummins Westport Inc. (Cummins Westport or CWI) is pleased to provide comments regarding staff's Proposed Beneficiary Mitigation Plan regarding the implementation of the Volkswagen Settlement – Environmental Mitigation Trust for California, Appendix D-2. We have had the opportunity to participate in a number of the workshops held statewide as well as direct interaction with staff on various low NOx technology deployment options.

Cummins Westport is proud to have certified two natural gas fueled engine platforms, L9N (8.9-liter) and ISX12N (11.9-liter), to the California Air Resources Board's (CARB) option near-zero NOx 0.02 g/bhp-hr standard. In addition, Cummins Westport has a natural gas fueled B6.7N (6.7-liter) engine certified at the low-NOx 0.10 g/bhp-hr standard. These engines are available in a wide variety of truck and bus chassis makes and models. These engines provide the added benefits of being "carbon negative" when operated on Renewable Natural Gas. We believe these engines are a key part of the effort to not only mitigate the excess emissions associated with this settlement, but also toward achieving overall clean air goals.

Our engines are currently in full commercial production as a standard option and integrated into the same build lines as their diesel counterparts. These engines are produced, without limitation to volume, as ordered and do not wait for any "special run".

We look forward to continuing to work closely with CARB Staff to develop an effective, efficient program. Recognizing many of the details of the program will be part of the next phase discussions.

Cummins Westport supports the Staff Proposal related to the Low-NOx Combustion category:

- Including any 1992 to 2012 engine model year as eligible for repower with a current production near-zero engine in waste haulers, dump trucks and concrete mixers.
- Allowing up to \$50,000 toward a repower with a near-zero engine in government fleets.

To support the anticipated adoption of the Staff Proposal, we are doing the following:

- Begun work to identify and contact government fleets with eligible vehicles consistent with the Staff Proposal to repower eligible vehicles with near-zero technology.
- Developed an engine production and repower labor plan necessary to support an aggressive repower program with near-zero technology.

We are pleased to report that assuming eligible fleets choose to participate in a near-zero repower program, there is capacity to perform hundreds of repowers statewide annually beginning in the fourth quarter of this year. The implementation timing is only limited by the timing of fund availability to qualifying fleets.

Again, we look forward to continuing to work with CARB Staff on the development of the VW Mitigation Program to reach or exceed the targeted reductions.

Best regards,



Tom Swenson, P.E.  
Business Development Manager